

## EXHIBIT G



Brett M. Weaver

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January 8, 2010

**VIA EMAIL & U.S. MAIL**

Tomio Narita  
Simmonds & Narita LLP  
44 Montgomery Street, Suite 3010  
San Francisco, CA 94104

Re: **Tourgeman v. Collins Financial Services, Inc., et al. Case No. 08-CV-1392**

Dear Tomio:

Thank you for taking the time to speak with me yesterday regarding your clients' document production and discovery responses. This letter memorializes our conversation. If there is anything you disagree with, please let me know.

During our call, you said your clients would begin producing documents, on a rolling basis, on January 8, 2010. And you agreed to produce documents related to Paragon,<sup>1</sup> the debt collection entity associated with Collins Financial. You anticipated that you would complete production and provide supplemental responses before the first depositions on January 20, 2010.

Specifically, you agreed to provide supplemental responses and documents related to the following discovery requests:

- **Nelson & Kennard** – Request for Production nos. 11, 20  
Special Interrogatory nos. 1, 2, 16, 18, 19
- **Collins Financial** – Request for Production nos. 3, 4, 6, 7, 8, 9, 10, 12, 15  
Special Interrogatory nos. 1, 6, 7, 8, 13, 15, 16, 20

While you doubt they will provide supplemental responses and documents, you agreed to consult your clients concerning the following discovery requests:

- **Nelson & Kennard** – Request for Production nos. 3-6, 12-15, 19, 23, 25, 26

<sup>1</sup> We agreed Paragon Way and Collins Financial were, for all intents and purposes, one in the same when it came to collecting debts. Thus, whenever a request calls for documents or seeks information for Collins Financial, you will treat it as though the request was also directed to Paragon Way.

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Special Interrogatory nos. 5, 7, 8, 10, 11, 14

- **Collins Financial** – Request for Production nos. 11, 27, 13, 25  
Special Interrogatory no. 9, 10

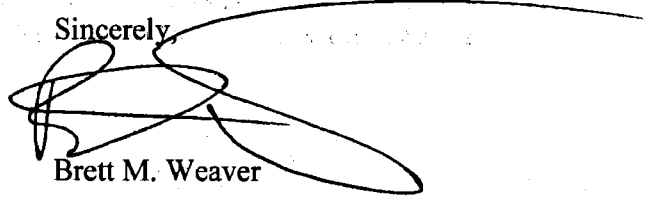
Please let me know by January 15 whether your clients will provide supplemental responses and documents to the above requests.

Although we did not specifically address them, please let me know by January 15 whether your clients will agree to supplement their responses to the following requests:

- **Nelson & Kennard** – Request for Production nos. 7, 10, 21, 29  
Special Interrogatory no. 20
- **Collins Financial** – Request for Admission no. 13  
Request for Production no. 20  
Special Interrogatory no. 19

To date we have exchanged five letters and engaged in a nearly two hour telephone conversation. At this point, if we cannot resolve the issues discussed above, I think we will have no choice but to seek the assistance of the Court.

Sincerely,



Brett M. Weaver

for JOHNSON BOTTINI, LLP

BMW/kmc

cc: Dan Murphy